



San Juan Cable  
1911 C St  
Bellingham, WA 98225

September 20, 2013

ATTN: Federal Communications Commission  
Electronic Comment Filing System

Subject: WC Docket No. 10-90, Connect America Phase 1 Challenge Process

To Whom It May Concern:

San Juan Cable is a small privately owned cable operator with two independent systems. One system located on the Lummi Indian Reservation (Bellingham, WA) and the other on Guemes Island (Anacortes, WA). Both of these systems were purchased just over 2 years ago. The systems were independently owned and too small and isolated to be considered for purchase by the larger cable operators.

San Juan Cable objects to Connect America Funds being used to finance overbuild by the incumbent carriers Frontier, and Centurylink Communications.

San Juan Cable began deploying DOCSIS services at 3mb down, 1mb up in early 2011. The owners Ray & Sally Poorman have poured tremendous time and personal investment into rebuilding and upgrading these systems. The systems are now capable of up to 15mb down and 5 mb up, with the basic package provisioned at 6mb/1mb. San Juan Cable in cooperation with the Lummi Tribal authority are extending fiber optic connectivity to their schools and facilities, and investing in the local community. We work with low income families, the Lummi General Assistance program, and the people of Guemes Island to fix the last mile problem.

If Connect America Funds are used to finance expansion by Frontier and Centurylink, San Juan Cable's will suffer extensive damage. The areas are under populated and offer little return on investment as identified by the incumbents in applying for federal funds. Additional competition will only damage and detract from our efforts to help our communities. As a small private company we do not have the time or financial capability to fight billion dollar companies receiving government assistance. It is only recently through the American Cable Association we had been notified of our areas being "unserved". Since being notified we have submitted our coverage maps to the "National Broadband Map" and filed FCC Form 477.

Defending our investment by filing FCC Forms, monitoring fund distribution by the CAF that should be supplying funds to assist our last mile investments, and submitting broadband service area maps are onerous in a 3 person company trying to help the communities. It is unfortunate that the Washington broadband mapping program could not pick up the phone or search the internet in our area to find local service. We had hoped to apply for "last mile" funds, however the process is so complicated it takes weeks to pull together the information and a full time attorney to fill out paperwork. Even the Lummi Indian tribe applied for funds prior to our purchase of the cable system and were denied, and is the reason we moved forward to help.

I have attached snapshots of our active cable modems on both properties as of September 20<sup>th</sup> 2013. All of the modems are operating at a minimum 6mb/1mb. In addition there is a separate attachment with our active service addresses and census blocks.

Regards,

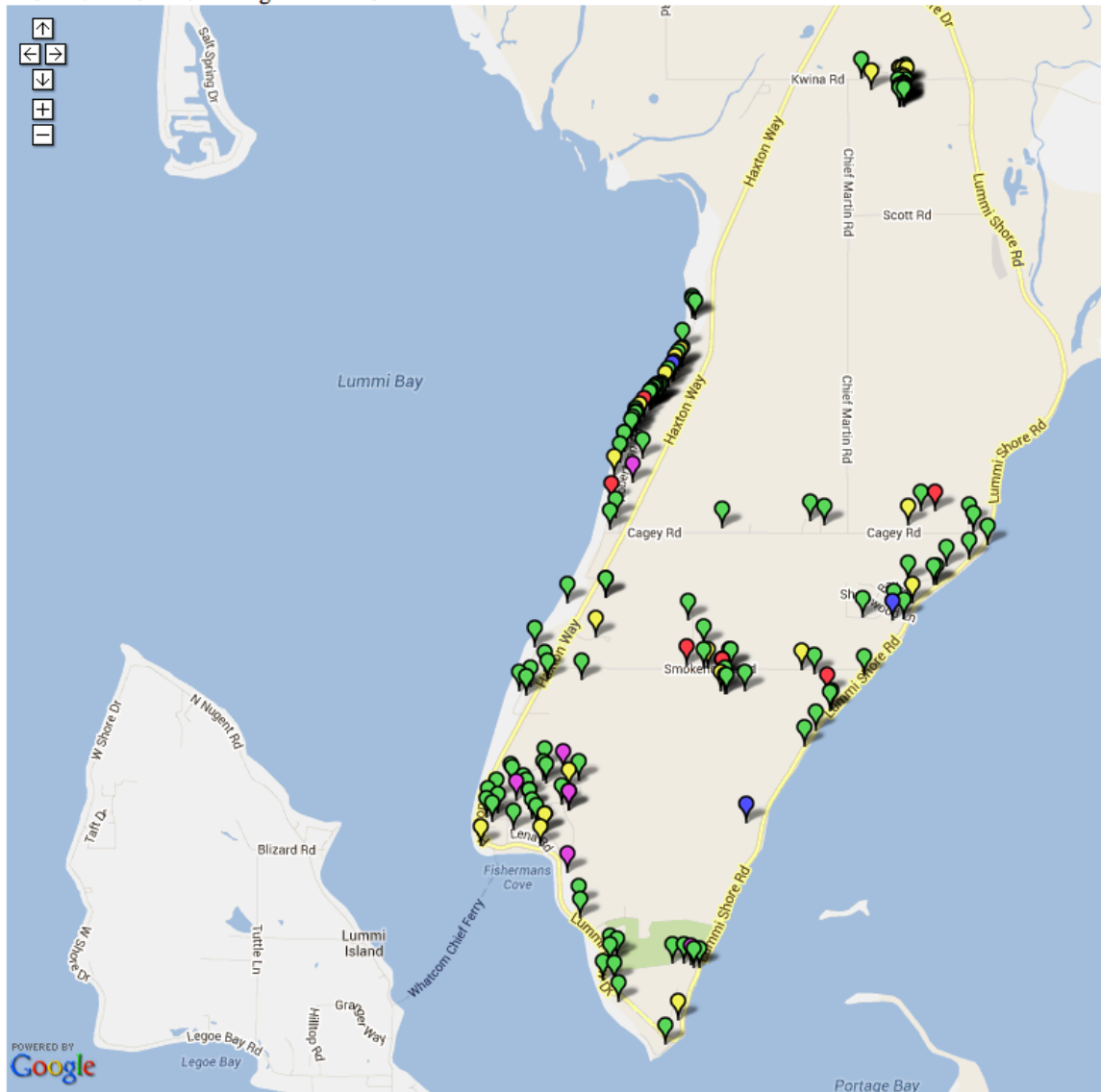
A handwritten signature in black ink, appearing to read 'Ray Poorman', with a long horizontal flourish extending to the right.

Ray Poorman, General Manager

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## Lummi Indian Reservation – Bellingham WA

📍 Online - 📍 Offline - 📍 HighTX - 📍 LowTX



# Guemes Island - Anacortes, WA

Online - Offline - HighTX - LowTX

